

THE HONORABLE LAUREN KING

UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

NINTENDO OF AMERICA INC., a  
Washington Corporation,

Plaintiff,

v.

JAMES C. WILLIAMS a/k/a ARCHBOX, an  
individual,

Defendant.

CASE NO. 2:24-CV-00960-LK

**DECLARATION OF IVAN AVILA  
CAMPILLO IN SUPPORT OF  
PLAINTIFF'S SUPPLEMENTAL BRIEF  
REGARDING REQUEST FOR CLERK'S  
ENTRY OF DEFAULT**

I, IVAN AVILA CAMPILLO, declare as follows:

1. I am employed by Plaintiff Nintendo of America Inc. ("Nintendo") as Manager, Product Lifecycle Management. I have worked for Nintendo in this or other positions since 09/13/2008, and through these positions am familiar with Nintendo's processes for maintaining customer information and accounts. From the course of my duties and responsibilities at Nintendo, I have personal knowledge of the following facts and, if called and sworn as a witness, could and would competently testify thereto.

2. As part of my role at Nintendo, I have assisted in efforts to investigate violations of Nintendo's rights taking place online through so-called "freeshops," which offer pirated copies of copyrighted games for Nintendo's popular Switch platform via the Internet (hereinafter the

DECL. OF IVAN AVILA CAMPILLO  
Case No.2:24-CV-00960-LK

1

LOWE GRAHAM JONES

1325 Fourth Avenue, Ste. 1130  
Seattle, Washington 98101  
206.381.3300 • F: 206.381.3301

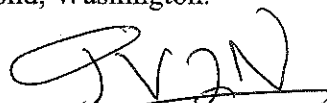
1 “Infringing Shops”). In particular, I have assisted with efforts to identify an individual known  
 2 online as “archbox” in connection with the Infringing Shops, including through undertaking and  
 3 supervising searches of Nintendo’s internal systems and customer account data.

4 3. I am aware that in or about February of 2024, Nintendo succeeded at tentatively  
 5 identifying “archbox” as an individual named James Williams believed to live in the Phoenix,  
 6 Arizona area, as well as likely email addresses being used by Mr. Williams, including the email  
 7 addresses james.williams.az@gmail.com or jameswilliamsaz@gmail.com. I further understand  
 8 that based on public records, a tentative address for Mr. Williams was identified of 17557 W Villa  
 9 Chula Lane, Surprise, AZ 85387 (the “Surprise Address”). My group at Nintendo subsequently  
 10 undertook activities to determine whether based on such information, one or more Nintendo  
 11 accounts for such an individual could be located in Nintendo’s customer account records. We tied  
 12 the above information to at least two Nintendo accounts and records. The information also  
 13 confirmed that multiple repair orders were submitted using the Surprise Address and gmail.com  
 14 accounts.

15 4. Recently, I participated in efforts to determine if additional information could be  
 16 located in Nintendo’s business records that supported Mr. Williams’ residence at the Surprise  
 17 Address. These efforts confirmed that repair orders for James Williams had been filled out using  
 18 the address of 17557 W Villa Chula Ln, Surprise, Arizona, 85387, including a repair shipped to  
 19 that address on or about March 25, 2024. Another, from 2023, included the Surprise Address and  
 20 the e-mail address “james.williams.az@gmail.com.” Attached hereto as **Exhibit 1** are true and  
 21 correct copies of excerpts from Nintendo business records reflecting this information (partially  
 22 redacting the phone numbers listed).

23 I declare under penalty of perjury under the laws of the United States of America that the  
 24 foregoing is true and correct to the best of my knowledge, information, and belief.

25 Executed on November 7, 2024, at Redmond, Washington.

26   
 27 \_\_\_\_\_  
 28 Ivan Avila Campillo

DECL. OF IVAN AVILA CAMPILLO  
 Case No.2:24-CV-00960-LK

LOWE GRAHAM JONES LLC

1325 Fourth Avenue, Ste. 1130  
 Seattle, Washington 98101  
 206.381.3300 • F: 206.381.3301

## **EXHIBIT 1**

English (US) - Ivan Avila Campillo  
NINTENDO

Search in Repair Order james.williams.az@gmail.com

**Repair Order**  
SRO #: 60297963 Status: Draft

View More Status Save

Repair

**Consumer Information**

Shipping Information

Activity

Terms And Conditions

Summary

**Consumer Information**

Consumer Information

Comments

\* Consumer Search

Name

James Williams

Email Address

james.williams.az@gmail.com

Phone Number

Mobile: 623

Shipping Address

James Williams  
17557 W Villa Chula Ln  
Surprise, Arizona, 85387  
United States

☐ Opt In to receive status notifications. Standard message and data rates may apply. You can stop these notifications at any point by texting 'stop'

Language

English (US) - USA

[Continue to Next Section →](#)

English (US) - Ivan Avila Campillo  
NINTENDO

Search in Repair Order jameswilliamsaz@gmail.com Go 2

**Repair Order**  
SRO #: 60768976 Status: Closed

View More

Repair

**Consumer Information**

Shipping Information

Activity

Payments

Summary

**Consumer Information**

Consumer Information

Comments

Consumer Search

Name

James Williams

Email Address

jameswilliamsaz@gmail.com

Phone Number

Mobile: 623

Shipping Address

James Williams  
17557 W Villa Chula Ln  
Surprise, Arizona, 85387  
United States

☒ Opt in to receive status notifications. Standard message and data rates may apply. You can stop these notifications at any point by texting 'stop'

Language

English (US) - USA

Continue to Next Section

Nintendo

English (US) - Ivan Avila Campillo  
NINTENDO

Search in Repair Order jameswilliamsaz@gmail.com Go

Repair Order

SRO #: 60768994 Status: Closed

View More

Repair Consumer Information Shipping Information Activity Payments Summary

Consumer Information

Comments

Consumer Search

Name

James Williams

Email Address

jameswilliamsaz@gmail.com

Phone Number

Mobile: 623 [REDACTED]

Shipping Address

James Williams  
17557 W Villa Chula Ln  
Surprise, Arizona, 85387  
United States

☒ Opt In to receive status notifications. Standard message and data rates may apply. You can stop these notifications at any point by texting 'stop'

Language

English (US) - USA

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